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Attorneys for Plaintiffs

GOLD COUNTRY DEVELOPMENT, LLC et al

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

GOLD COUNTRY DEVELOPMENT,
LLC, a New York State limited liability
company, et al.,

Plaintiff,

vs.

COUNTY OF EL DORADO, a public
entity, et al

Defendant.

No. 2:20-CV-01712-MCE-CKD
EX PARTE APPLICATION AND
STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
MOTION TO DISMISS

Judge: Honorable Morrison C. England, Jr.
Courtroom: 7

Pursuant to Local Rule 144(a), all Plaintiffs and Defendants hereby stipulate that
Plaintiffs may have until March 4, 2021 to respond to the Motion to Dismiss Plaintiffs'
Complaint. Defendant may have until March 18, 2021 to reply to Plaintiffs' Response.

1 IT IS SO STIPULATED.

2 Dated: January 21, 2021

/s/

JAMES L. BRUNELLO

3 Attorney for Plaintiffs

4 Gold County Development, LLC et al

5 Dated: January 21, 2021

/s/

JOHN A .WHITESIDES

6 ANGELO, KILDAY & KILDUFF, LLP

7 Attorney for Defendants

8 County of El Dorado et al

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11 **DECLARATION OF JAMES L. BRUNELLO**

12 1. I am over the age of 18 and if called to testify as a witness, I could and would testify
13 competently to the facts stated herein.

14 2. I am the attorney for the Plaintiffs, along with my associate Karen Pine.

15 3. Counsel Karen Pine has recently tested positive for Covid. I have the symptoms
16 including loss of taste and smell.

17 4. Counsel Karen Pine is quarantining at her home in rural El Dorado County with
18 limited access to internet, other than her phone

19 5. Counsel will be quarantining at home and will not have access to the office for at least
20 a week.

21 6. Counsel Karen Pine was a paralegal prior to her bar admission and has performed all
22 filing and administrative tasks for our office for the past 30 years. She is not available.
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1 7. The parties request that the Court extend the time to:

2 a. March 4, 2021 as the last date for the plaintiffs to file a response to defendants'
3 motion to dismiss plaintiffs' complaint;

4 b. March 18, 2021 to be the last date for defendants to file a reply to plaintiffs'
5 response to dismiss plaintiff's complaint.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct and that this declaration is executed on January 21, 2021
8 Sacramento County, California.

9 /s/
10 James L. Brunello

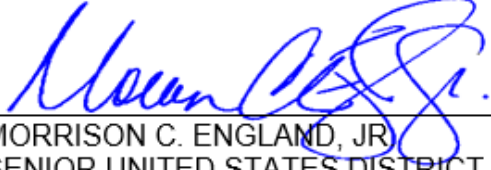
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13 PLAINTIFFS' EX PARTE STIPULATION AND ORDER IS GRANTED:

14 March 4, 2021 is the last date for the plaintiffs to file a response to defendants'
15 motion to dismiss plaintiffs' complaint;

16 March 18, 2021 is the last date for defendants to file a reply to plaintiffs' response
17 to dismiss plaintiff's complaint.

18 IT IS SO ORDERED.

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20 Dated: January 29, 2021

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23 MORRISON C. ENGLAND, JR.
24 SENIOR UNITED STATES DISTRICT JUDGE
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